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10
11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 Alexander Ferrari,

Case No.: 2:23-cv-00453-APG-NJK

14 Plaintiff,

15 v.
16 **Stipulation and Order for an**
17 **extension of time for Plaintiff to**
18 **respond to Defendant Bank of**
19 **America, N.A.'s Motion for**
20 **Judgment on the Pleadings**

21 Equifax Information Services, LLC and
22 Bank of America, N.A.,

23 Defendants.

24 Alexander Ferrari ("Plaintiff") and Bank of America, N.A.
25 ("Defendant") (together as "the Parties") by counsel, hereby submit this
26 Stipulation and Order for an extension of time for Plaintiff to respond to
27 Defendant's Motion for Judgment on the Pleadings filed on August 31, 2023.
ECF 22. This is the first request for an extension of this deadline.

The extension is sought because the parties are engaged in settlement discussions and hope to avoid the additional expense of fully briefing the Motion, as without this added cost, the parties are in a better position to reach a resolution.

As such, the parties are requesting an extension of time for Plaintiff to respond to Defendant's Motion by 14 days from the current deadline of September 14, 2023 to **September 28, 2023**.

This Stipulation is brought in good faith and not for purposes of delay. The parties hereby respectfully request that the Court order that Plaintiff's opposition to the pending Motion shall be due on or before **September 28, 2023**.

Dated: September 13, 2023.

FREEDOM LAW FIRM, LLC

/s/ *Gerardo Avalos*

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~~IT IS SO ORDERED:~~

UNITED STATES DISTRICT JUDGE

DATED: September 14, 2023